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Attorney for Defendant
JOSE LUIS RAMOS

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Case No. 2:21-cr-00225-WBS
)	
Plaintiff,)	STIPULATION FOR MODIFICATION OF
)	CONDITIONS OF PRETRIAL RELEASE;
vs.)	EXHIBIT A; ORDER
)	
JOSE LUIS RAMOS,)	Hon. Carolyn K. Delaney
)	
Defendant.)	
)	

The defendant, JOSE LUIS RAMOS, by and through his attorney of record, Assistant Federal Defender Megan T. Hopkins, and the UNITED STATES, by and through its attorney of record, Alstyn Bennett, hereby stipulate to and request an order from this Court modifying the conditions of Mr. Ramos' pretrial release to eliminate the condition for drug and alcohol testing. The proposed second amended special conditions of pretrial release filed with this stipulation as Exhibit A were provided to defense counsel by the pretrial services officer, and reflect the requested modification.

Mr. Ramos has been on pretrial release in this district since December 2022, on a \$50,000 unsecured appearance bond. *See* Dkt. 82. Mr. Ramos is in compliance with all of his conditions of release. One of those conditions of release is drug and alcohol testing. Mr. Ramos has never submitted a positive drug test and does not report any concerns with or history of substance abuse. In light of Mr. Ramos' history of compliance with all of his conditions and the reduced assessment of flight risk and/or danger in this case related to substance abuse, the parties request

1 that the drug and alcohol condition be removed and the attached **Second Amended Special**
2 **Conditions of Pretrial Release** be adopted as the order of this Court. The parties do not request
3 a hearing in this matter in light of this stipulation.
4

5 Respectfully submitted,

6
7 DATED: September 6, 2023

HEATHER E. WILLIAMS
Federal Defender

8 /s/ Megan T. Hopkins

9 MEGAN T. HOPKINS
10 Assistant Federal Defender
Attorney for JOSE LUIS RAMOS
11

12 DATED: September 6, 2023

PHILLIP A. TALBERT
United States Attorney

14 /s/ Alstyn Bennett

15 ALSTYN BENNETT
16 Assistant United States Attorney
Attorney for the United States
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ORDER

GOOD CAUSE HAVING BEEN SHOWN, IT IS HEREBY ORDERED THAT the Second Amended Special Conditions of Release for defendant, Jose Luis Ramos, are hereby adopted. The drug and alcohol testing condition shall be removed. All other conditions of pretrial release shall remain in force.

Dated: September 6, 2023



CAROLYN K. DELANEY
UNITED STATES MAGISTRATE JUDGE